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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Plaintiff,

v.

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COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS et al.,

Defendants.

CIVIL CASE No. 99-00017

JOINT MOTION TO CONTINUE STATUS CONFERENCE

Judge: Hon. Ramona V. Manglona

Date: January 16, 2014

Time: 8:30 a.m.

Plaintiff United States of America, and Defendants, the Commonwealth of the Northern Mariana Islands, the Governor of the Northern Mariana Islands, the Commissioner of the Department of Corrections, and the Secretary of the Department of Community and Cultural Affairs (collectively, "the Commonwealth"), through undersigned counsel, respectfully request that the Status Conference scheduled for January 16, 2014, at 8:30 a.m. be continued and rescheduled for January 30, 2014. As reported to the Court during the December 6, 2014 status conference, the United States and the Commonwealth have been working together on a motion to terminate the Consent Decree in this case with the intention of filing the motion prior to the next status conference. Additional time is needed to finalize and submit the joint motion.

Further, Plaintiff requests the Court's permission for its attorney, Jeffrey R. Murray, of the United States Department of Justice, Civil Rights Division, Special Litigation Section, to participate telephonically in the status conference.

RESPECTFULLY SUBMITTED this 15th day of January 2014.

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¹ The Commissioner of Corrections succeeded the Commissioner of Public Safety, the Secretary of Labor, and the Secretary of Community and Cultural Affairs as the official in charge of the detention facilities that are the subject of the Consent Decree.

1	For the Commonwealth Defendants:
2	/s/ Teresita J. Sablan
3	Teresita J. Sablan (T0089)
4	Assistant Attorney General
5	For the United States:
6	JOCELYN SAMUELS
7	Acting Assistant Attorney General United States Department of Justice
8	Civil Rights Division
9	By: /s/ Jeffrey R. Murray
	JEFFREY R. MURRAY Trial Attorney
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